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**IN THE UNITED STATES DISTRICT COURT
 FOR THE DISTRICT OF WYOMING**

JAYLYN WESTENBROEK, HANNAH,
 HOLTMEIER, ALLISON COGHAN, GRACE
 CHOATE, MADELINE RAMAR, and MEGAN
 KOSAR, on behalf of themselves and
 derivatively on behalf of KAPPA KAPPA
 GAMMA FRATERNITY,

Plaintiffs,

v.

KAPPA KAPPA GAMMA FRATERNITY, an
 Ohio non-profit corporation, as a Nominal
 Defendant and as a Direct Defendant;
 MARY PAT ROONEY, President of the
 Fraternity Council of KAPPA KAPPA GAMMA
 FRATERNITY, in her official capacity, KAPPA
 KAPPA GAMMA BUILDING CO., a Wyoming
 non-profit corporation, and ARTEMIS
 LANGFORD,

Defendants.

Civil Action No.: 23-CV-00051-ABJ

**DEFENDANTS KAPPA KAPPA GAMMA FRATERNITY, MARY PAT ROONEY, AND
 KAPPA KAPPA GAMMA BUILDING CO.’S MOTION TO DISMISS**

COME NOW, the Defendants Kappa Kappa Gamma Fraternity (“Kappa”), Mary Pat Rooney (“Rooney”), and Kappa Kappa Gamma Building Co. (the “Building Co.”) (collectively, “Defendants”) and hereby move this Court for an Order dismissing Plaintiffs’ First Amended Verified Complaint (“Amended Complaint”) pursuant to Rules 12(b)(1), 12(b)(2), and 12(b)(6) of the Federal Rules of Civil Procedure because the Court lacks subject-matter jurisdiction over the Building Co. and personal jurisdiction over Rooney, and the Amended Complaint fails to states a claim upon which the Court can grant relief. Defendants submit the accompanying Memorandum of Law in support of this Motion.

Dated: June 20, 2023

Respectfully submitted,

/s/ Natalie M. McLaughlin

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*Attorneys for Defendants Kappa Kappa Gamma
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CERTIFICATE OF SERVICE

The undersigned does hereby certify that a true and correct copy of the foregoing document was delivered to the Court via the CM/ECF System and served upon counsel via CM/ECF electronic transmission this 20th day of June, 2023.

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/s/ Brian W. Dressel

Brian W. Dressel